

# EXHIBIT B

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Before The Honorable Richard Seeborg, Judge

ANIBAL RODRIGUEZ, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	<b>No. 3:20-cv-04688-RS</b>
	)	
GOOGLE LLC, et al.,	)	
	)	
Defendants.	)	
_____	)	

San Francisco, California

Wednesday, July 30, 2025

**TRANSCRIPT OF PROCEEDINGS**

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(Appearances continued on the following page)

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1       **Wednesday - July 30, 2025**

9:40 A.M.

2                               P R O C E E D I N G S

3                               ---o0o---

4               **THE CLERK:** All rise. The United States District  
5 Court for the Northern District of California is now in  
6 session. The Honorable Richard Seeborg is presiding.

7               You may be seated. We are calling Case Number 20-CV-4688,  
8 Rodriguez, et al., versus Google. Appearances please, starting  
9 with the plaintiff and then the defendant, if you want to come  
10 up to the podium, please.

11              **MR. BOIES:** Good morning, Your Honor. David Boies of  
12 Boies Schiller & Flexner on behalf of the plaintiff class.  
13 With me today are my colleagues, Alison Anderson, Alex Boies,  
14 Mark Mao, James Lee, Beko Richardson, and Samantha Parrish.

15              **THE COURT:** Good morning.

16              **MR. BOIES:** Good morning.

17              **MR. HUR:** Good morning, Your Honor. Ben Hur from  
18 Cooley for Google. I'm here with my colleagues, Mike  
19 Attanasio, Simona Agnolucci, Eduardo Santacana, Argemira  
20 Florez, Harris Mateen, Naiara Toker, and Isabella Corbo.

21              **THE COURT:** Good morning. So we have a lot to cover  
22 today. I always like pretrial conferences. It's kind of a --  
23 you feel like you get a lot done. You actually do the nuts and  
24 bolts of it all.

25              What I'm going to do, just to give you a roadmap of what

1 barrel ahead.

2 MR. BOIES: Yeah. I think --

3 THE COURT: Okay.

4 MR. BOIES: I think so, Your Honor. Could I raise one  
5 other issue?

6 THE COURT: Sure.

7 MR. BOIES: And this is to get the Court's guidance.  
8 Last month, they served a 40-page supplemental expert  
9 report after obviously the Daubert motions had been ruled on.  
10 Now, in what we got from them, the additional points that were  
11 made in this expert report are not in their demonstrative  
12 exhibits. So we're not sure how much of this is going to come  
13 in to the trial or not.

14 THE COURT: Which expert are we talking about?

15 MR. BOIES: What?

16 THE COURT: Which expert are we talking about?

17 MR. BOIES: This was Knittel.

18 THE COURT: Okay.

19 MR. BOIES: Knittel. And the -- we obviously object  
20 to their supplementing their expert report at this stage, and I  
21 guess the issue is should we bring a formal motion for the  
22 Court to decide? Is that something that the Court wants to  
23 discuss now?

24 THE COURT: Well, Mr. Hur, what are you going to -- go  
25 ahead.

1                   **MR. HUR:**   Thank you, Your Honor.

2                   It sounds like there is a dispute about something that our  
3                   expert said in that report. I think, Your Honor, we should  
4                   meet and confer. We have some concerns about what their expert  
5                   said. So I think we should meet and confer, and if we need a  
6                   motion, we can agree --

7                   **THE COURT:**   Okay. If you are going to file -- if the  
8                   meet and confer fails to resolve these questions, I want you to  
9                   file any motions that are going to pertain to supplementing the  
10                  expert reports on either side promptly. So I would want -- if  
11                  you're going to -- if this isn't going to resolve in some other  
12                  way, then I want the motion by early next week because time is  
13                  fleeting, and I want to get as much done as we can get done in  
14                  advance.

15                  So plan to file it, say, by Tuesday of next week if you're  
16                  going to have, you know, a dispute with respect to either  
17                  side's supplemental expert documents. And the only other, as  
18                  I'm trying to think back on what we talked about today is going  
19                  to be -- what was the other motion that I'm anticipating?

20                  **MR. HUR:**   We were going to file a motion in limine --

21                  **THE COURT:**   Well, one is to -- with respect to Mr. --  
22                  whatever his name is, your representative.

23                  **MR. BOIES:**   Cataldo.

24                  **MR. HUR:**   Cataldo.

25                  **THE COURT:**   Yeah. So that's going to be a motion.

1 And then supplemental expert. Anything else that I'm --

2 MR. HUR: I thought there was one motion.

3 MR. SANTACANA: And a motion in limine, Your Honor,  
4 that you invited earlier today.

5 THE COURT: And remind me what it's about.

6 MR. SANTACANA: I need to remind myself.

7 Your Honor, this is about multiplying the damages by 98  
8 months.

9 THE COURT: Oh, yes. Okay. I'm going to get a motion  
10 on that, that's right.

11 MR. SANTACANA: Yes.

12 THE COURT: And then as I said -- I said this, but  
13 I'll repeat it. There is a subpoena. This goes to number 6,  
14 and I will deal with the motion to quash and the motion in  
15 limine together, and you'll get an order on that issue. Okay.

16 And as Karen reminds me, I think everybody agrees with  
17 this, witnesses are excluded until -- yeah, that's way we  
18 operate. Okay?

19 So I will be giving you written orders on the motions in  
20 limine, and I will then rule on these additional items that you  
21 submit, but otherwise, I think we're just ready to go, I think.

22 Any settlement discussions going on? I just want to know.  
23 I don't want to know anything about them. I just want to know  
24 if they're going on.

25 MR. BOIES: We have had them, Your Honor, and I think

**CERTIFICATE OF REPORTER**

I certify that the foregoing is a correct transcript from  
the record of proceedings in the above-entitled matter.

DATE: Saturday, August 2, 2025



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April Wood Brott, CSR No. 13782



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**California Northern District**

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